

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

FULL CIRCLE UNITED, LLC,

Plaintiff,

-against-

BAY TEK ENTERTAINMENT, INC.,

Defendant.

Case No: 20 Civ. 3395 (BMC)

**NOTICE OF MOTION**

BAY TEK ENTERTAINMENT, INC.,

Counterclaim-Plaintiff,

-against-

FULL CIRCLE UNITED, LLC, and ERIC PAVONY,

Counterclaim-Defendants.

PLEASE TAKE NOTICE THAT Plaintiff Full Circle United, LLC shall move the United States District Court for the Eastern District of New York on a date to be determined by the Court for an order *in limine*:

1. Excluding Defendant's proposed Exhibits D, E, F, J, AB, AC, CR, CS, CT, CU, CZ, DA, DC, DD, EE; EF, EG, EH, and EV-FT;
2. Precluding any argument, evidence, or testimony on the following topics:
  - A. Other Litigation by Plaintiff or its Principal;
  - B. The Criminal History of any Witness;
  - C. Attorneys And Attorney-Client Relationships;
  - D. Plaintiff's Ability to Raise Investment Capital;

- E. Dismissed Claims Or Defenses;
- F. Discussions By Counsel;
- G. Settlement Discussions;
- H. *In Limine* Motions Or Rulings;

and for such other relief as the Court deems just and proper.

This motion is based upon the accompanying Declaration of Robert Glunt and the exhibits annexed thereto, the accompanying Memorandum of Law, and all prior proceedings and filings in this case.

**Dated:** New York, New York  
February 28, 2025

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By: /s/ Robert Glunt  
Robert Glunt

*Attorneys for Plaintiff*